

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
GOOGLE'S MOTION TO SEAL AT ECF NO. 370**

1. Google filed its response to Plaintiffs' Motion for Partial Judgment on the Pleadings on August 31, 2023. ECF Nos. 368-69.
2. Attached to that response were 18 exhibits that Google submitted provisionally under seal pursuant to the terms of the operative Protective Order in this matter. Google's memorandum in support of its Motion to Seal indicates that it would not be seeking to maintain these exhibits under seal absent the Protective Order. ECF No. 370, at 1.
3. Plaintiffs' response to the motion to seal is currently due on **September 7, 2023**. Pursuant to Local Rule 5, Plaintiffs must articulate a basis for retaining any portion of the exhibits under seal.
4. Due to the volume of the exhibits and the fact that certain exhibits involve information from third parties, Plaintiffs respectfully request an extension of one week, until **September 14, 2023**, to respond to Google's motion to seal to complete the analysis of what material Plaintiffs believe should remain under seal, and what material can be publicly docketed.
5. Plaintiffs submit that good cause exists to grant this extension, as Plaintiffs have proceeded diligently in this matter, no party will be prejudiced by the requested relief, and the

requested relief will not affect any other deadlines in this case. *See generally Roe v. Howard*, No. 1:16-cv-562, 2017 U.S. Dist. LEXIS 187258, *1-2 (E.D. Va. June 30, 2017).

6. Plaintiffs have met and conferred with Google regarding this motion. Google informed Plaintiffs that it does not oppose the relief requested herein.

Dated: September 6, 2023

Respectfully submitted,

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